

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

SCOTT DENING, an individual,

Plaintiff,

v.

Civil Action No. 1:23-CV-1117

GLOBE LIFE AMERICAN INCOME  
DIVISION a/k/a AMERICAN INCOME  
LIFE INSURANCE COMPANY, and  
GLOBE LIFE INC.

Defendants.

**GLOBE LIFE INC.’S MOTION TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION**

Defendant Globe Life Inc. (“Globe Life”) moves to dismiss Plaintiff Scott Dening<sup>1</sup> (“Plaintiff”)’s Complaint under Fed. R. Civ. P. 12(b)(2) because this Court lacks personal jurisdiction over Globe Life. Plaintiff is a former employee of American Income Life Insurance Company (“AIL”). AIL terminated Plaintiff on May 19, 2023, and Plaintiff has sued both AIL *and* its parent company, Globe Life, for wrongful discharge in violation of the Michigan Whistleblowers Protection Act. Plaintiff pleads no facts to establish personal jurisdiction over Globe Life, a Delaware corporation with its principal place of business in Texas, Compl. ¶ 5, PageID.17, and a company that never employed Plaintiff. Because Globe is not “at home” in Michigan and has not taken any actions directed at Michigan to “purposefully avail” itself of Michigan law in connection with Plaintiff’s Complaint, the Court lacks personal jurisdiction over

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<sup>1</sup> On information and belief, it is Globe Life’s understanding that the correct legal spelling of Plaintiff’s last name is “Dehning,” but refers to him herein using the spelling in the caption of the Complaint filed by Plaintiff.

Globe Life and it should be dismissed from this lawsuit. *See Sullivan v. LG Chem, Ltd.*, 79 F. 4th 651 (6th Cir. 2023); *Buxton v. Hartin Asset Mgmt., LLC*, No. 1:22-cv-600, 2023 WL 4861724, at \*5-6 (W.D. Mich. July 31, 2023).

For the foregoing reasons and those articulated in the accompanying brief in support of this motion and the accompanying declaration, Globe Life respectfully requests that the Court dismiss it from this lawsuit for lack of personal jurisdiction.<sup>2</sup>

Dated: October 30, 2023

Respectfully submitted,

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<sup>2</sup> Pursuant to Local Rule 7.1(d), counsel for Globe Life reached out to Plaintiff's counsel to inquire if they would oppose the motion, but received no response to this request and assumes the motion is opposed.

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